

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

**UNITED STATES OF AMERICA,**

**Case No. 3:15-CR-00438-JO**

**v.**

**WINSTON SHROUT,**

**ORDER DISCLOSING TAXPAYER  
INFORMATION PURSUANT TO  
26 U.S.C. § 6103 and GRAND JURY  
PROCEEDINGS PURSUANT TO  
FED. R. CRIM. P. 6(e);  
PROTECTIVE ORDER  
PERTAINING TO DISCOVERY**

**Defendant.**

Upon motion of the United States, this Court being advised as to the nature of this case, it is hereby:

ORDERED that the United States may provide to the defendant, where applicable, discoverable tax returns, return information, and taxpayer information, pursuant to 26 U.S.C § 6103(h)(4) and as defined in 26 U.S.C. § 6103(b).


Further, based upon the motion of the United States of America for disclosure of documents and testimony presented to the federal grand jury in the District of Oregon, this Court finds that this request is made in connection with a criminal proceeding and that the United States has shown a particularized need. Therefore, it is hereby:

ORDERED that all records received and testimony of witnesses before the grand jury in

the above-captioned case, consistent with the government's obligations under Federal Rules of Criminal Procedure 16 and 26.2, the *Jencks Act*, *Brady v. Maryland*, 373 U.S. 83 (1963), and related Rules, statutes and case law, shall be disclosed to the defendant and his standby counsel, pursuant to Fed. R. Crim. P. 6(e)(3)(E)(i).

IT IS FURTHER ORDERED by this Court, pursuant to Rule 16(d)(1), Federal Rules of Criminal Procedure, that the defendant and his standby counsel shall make no disclosure of the taxpayer and grand jury material disclosed as requested by this motion to any other person, except that the defendant and his standby counsel may review that material with other members of the defense team, such as a legal assistant or investigator who is aiding in the representation of the defendant, or to any successor attorney for defendant in this criminal matter; and that no copies be made of the grand jury material provided; and that all copies received by the defendant and his standby counsel be returned to the U.S. Attorney's Office.

DATED this 10<sup>th</sup> day of Feb 2016.

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HONORABLE ROBERT E. JONES  
United States District Court Judge

PRESENTED BY:

BILLY J. WILLIAMS  
United States Attorney

/s/ Stuart A. Wexler  
STUART A. WEXLER  
United States Department of Justice  
Trial Attorney, Tax Division  
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